

1 MARTIN J. KRAVITZ, ESQ.  
2 Nevada Bar No. 83  
3 MICHAEL R. ESPOSITO, ESQ.  
4 Nevada Bar No. 13482  
5 KRAVITZ, SCHNITZER  
6 JOHNSON & WATSON, CHTD.  
7 8985 S. Eastern Avenue, Suite 200  
8 Las Vegas, Nevada 89123  
Telephone: (702) 362-6666  
Facsimile: (702) 362-2203  
E-Mail: [mkralevitz@ksjattorneys.com](mailto:mkralevitz@ksjattorneys.com)  
E-Mail: [mesposito@ksjattorneys.com](mailto:mesposito@ksjattorneys.com)  
*Attorneys for Defendant  
Capital One Bank (USA) N.A.*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 William Kearnes

13 Plaintiff,

14 v.

15 Experian Information Solutions, LLC,  
16 Experian Information Solutions, Inc.; Capital  
17 One Bank (USA) N.A., and Genesis FS Card  
Services, Inc.

18 Defendants.

19 Case No.: 2:22-cv-01333-APG-DJA

20 STIPULATION AND ORDER TO  
21 EXTEND TIME TO FILE ANSWER OR  
22 OTHER REPOSITIVE PLEADING

23 Plaintiff, WILLIAM KEARNES, by and through his counsel, the KIND LAW FIRM and  
the FREEDOM LAW FIRM, and Defendant CAPITAL ONE BANK (USA) N.A. (“Capital  
One”), by and through its counsel, KRAVITZ SCHNITZER JOHNSON & WATSON, CHTD.,  
hereby stipulate and agree as follows:

- 24 1. Plaintiff filed his Complaint for damages under FRCA, 15 U.S.C. §1681 on  
August 17, 2022;
- 25 2. Plaintiff served Capital One on August 19, 2022;
- 26 3. Capital One’s deadline to respond, move or otherwise plead to the Complaint is  
September 9, 2022;
- 27 4. Plaintiff and Capital One have agreed to continue Capital One’s responsive  
deadline until October 10, 2022;

KRAVITZ SCHNITZER JOHNSON & WATSON, CHTD.  
8985 S. Eastern Avenue, Suite 200  
Las Vegas, Nevada 89123  
(702) 362-6666

1       5. This continuance will allow Capital One to review its records pertaining to the  
2 allegations in the Complaint, and allow the Parties time to meaningfully discuss the merits of the  
3 same.

4       6. This is the first stipulation between the Plaintiff and Capital One to extend the  
5 time for Capital One to respond, move, or otherwise plead to the Complaint and it is not being  
6 entered into for purposes of delay.

7       DATED this 7<sup>th</sup> day of September, 2022.

8       DATED this 7<sup>th</sup> day of September, 2022.

9       KRAVITZ SCHNITZER  
10      JOHNSON & WATSON, CHTD.

KIND LAW

11      */s/ Michael R. Esposito, Esq.* \_\_\_\_\_  
12      MARTIN J. KRAVITZ, ESQ.  
13      Nevada Bar No. 83  
14      MICHAEL R. ESPOSITO, ESQ.  
15      Nevada Bar No. 13482  
16      8985 S. Eastern Avenue, Suite 200  
17      Las Vegas, Nevada 89123  
18      Attorneys for Defendant  
19      Capital One Bank (USA) N.A.

\_\_\_\_\_  
/s/ *Michael Kind*  
MICHAEL KIND, ESQ.  
Nevada Bar No. 13903  
8860 South Maryland Parkway, Suite 106  
Las Vegas, Nevada 89123

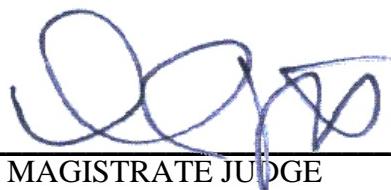
and

FREEDOM LAW FIRM  
GEORGE HAINES ESQ.  
GERARDO AVALOS, ESQ.  
Nevada Bar No. 15171  
8985 S. Eastern Avenue, Suite 350  
Las Vegas, Nevada 89123  
Attorney for Plaintiff

20      IT IS SO ORDERED.

**ORDER**

21      DATED: 9/8/2022

22        
23      \_\_\_\_\_  
24      U.S. MAGISTRATE JUDGE

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KRAVITZ SCHNITZER JOHNSON & WATSON, CHTD.  
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Las Vegas, Nevada 89123  
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